

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS

United States Courts
Southern District of Texas
FILED

DEC 06 2021

WILLIAM SOLOMON LEWIS
Plaintiff,

v.

HARRIS COUNTY, HARRIS COUNTY
SHERIFF ED GONZALEZ
Defendant.

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Nathan Ochsner, Clerk of Court

Civil Action No. _____

(Jury Trial is Demanded)

COMPLAINT

WILLIAM SOLOMON LEWIS, Plaintiff, pro se, whose post office address is 701 N. San Jacinto Street, Houston, Texas 77002, being duly sworn on his oath deposes and says that HARRIS COUNTY and HARRIS COUNTY SHERIFF, ED GONZALEZ, Defendants, are justly indebted to him in the sum of two hundred fifty thousand dollars and zero cents (\$ 250,000.00) in exemplary and nominal damages in connection to violations of the equal protection and due process clauses of the Fourteenth Amendment of the U.S. Constitution where their agency has refused to entertain an investigation based on complaints made against an employee of their agency due to my status as a detainee currently being held in the Harris County Sheriff's Office Jail.

JURISDICTION

The Court has jurisdiction under 42 U.S.C. § 1983 to hear all claims brought in this Complaint.

EXHAUSTION OF ADMINISTRATIVE REMEDIES

Defendant has failed to respond to Plaintiff's administrative claims submitted to jail officials on September 22, 2021, followed by the second step on October 12, 2021.¹

Plaintiff exhausted all available administrative remedies prior to filing this instant civil action as required pursuant to 42 U.S.C. § 1997e. See Wilson v. Epps, 776 F.3d 296, 301 (5th Cir. 2015) citing Wright v. Holingsworth, 260 F.3d 357, 358 (5th Cir. 2001).

RELIEF REQUESTED

Plaintiff seeks both exemplary and nominal damages associated with the above described violations of his constitutionally protected rights as well as all corresponding filing fees.

November 30, 2021
DATE

William Solomon Lewis
WILLIAM SOLOMON LEWIS

1. Inmates being held in the Harris County Sheriff's Office Jail are required to submit grievances through their computer system within the jail. In the instant case, the Defendants failed to respond to either grievance.

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AFFIDAVIT OF WILLIAM SOLOMON LEWIS

I, WILLIAM SOLOMON LEWIS, deposed and state that the following facts are true and correct under penalty of perjury to wit:

1. I, WILLIAM SOLOMON LEWIS, am currently incarcerated in the Harris County Sheriff's Office Jail;
2. I, WILLIAM SOLOMON LEWIS, made two attempts to report a felony committed by a Harris County Sheriff's Office law enforcement officer to the agency's internal affairs division on or around August of 2021 through written correspondence;
3. I, WILLIAM SOLOMON LEWIS, have had my efforts to pursue these felony complaints ignored and disregarded by the Harris County Sheriff's Office due to my status as a detainee in their jail and the agency's prejudice or bias against me;
4. I, WILLIAM SOLOMON LEWIS, attempted to pursue administrative remedies through the jail's grievance two-step submission process in an effort to have the matter looked into and compel Harris County Sheriff's Office, Internal Affairs Division to hear my complaint by submitting the step one grievance on September 22, 2021, followed by the step two grievance on October 12, 2021;

5. I, WILLIAM SOLOMON LEWIS, as of the date of this affidavit have never received a response to either grievance submitted, nor have I been interviewed by anyone from the Harris County Sheriff's Office pursuant to my request to report a felony committed by a law enforcement official within their agency in order to initiate a criminal complaint and investigation;

I, WILLIAM SOLOMON LEWIS, declare and verify under penalty of perjury pursuant to 28 U.S.C. § 1746 that the above stated facts are true and correct.

Executed on this November 30, 2021.

William Solomon Lewis
WILLIAM SOLOMON LEWIS
Affiant

HARRIS COUNTY SHERIFF'S OFFICE JAIL

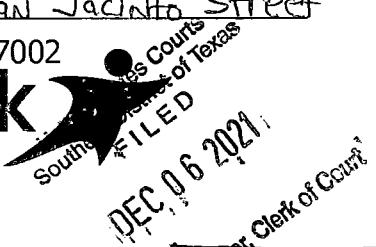
Name: William Lewis

SPN: 01361620 Cell: 5G1

Street 701 N. San Jacinto Street

HOUSTON, TEXAS 77002

aramark



INDIGENT



Bob Casey Federal Building
U.S. District Clerk
515 Rusk Avenue
Houston, TX 77002

77002-2623-0057

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